REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 11, 13 through 16, 18 through 21, and 23 through 31 are pending, with Claims 11, 16, 21, 26, and 27 being independent. Claims 11, 13 through 16, 18 through 21, 23 through 27, 30, and 31 have been amended.

Claims 11, 13 through 16, 18 through 21, 23 through 25, and 28 through 31 again were rejected under 35 U.S.C. §§ 102 and 103 over US 6,807,361 B1 (Girgensohn, et al.), taken alone or in view of US 6,999,613 B2 (Colmenarez, et al.). All rejections are respectfully traversed.

Claims 11, 16, and 21 variously recite, *inter alia*, determining a time for dividing the moving picture data, for generating plural moving picture based on the camera control command (*received from a terminal apparatus displaying the moving picture data taken by the camera unit*) for controlling the camera unit which is taking the moving picture data.

Claims 26 and 27 recite, *inter alia*, determining a time for dividing the moving picture data, based on the area information (*received from a terminal apparatus*) about the prohibited area *and* the camera control command (*received from the terminal apparatus*) such that a first moving picture file based on a first moving picture data received in a period between a first time and a second time, a second moving picture file based on a second moving picture data received in a period between the second time and a third time, and a third moving picture file based on a third moving picture data received in a period between the third time and a fourth time are generated *in a case where the camera unit is controlled in accordance with the camera control command* such that the first moving picture data does not include the prohibited area and the

second moving picture data includes the prohibited area and the third moving picture data does not include the prohibited area.

However, Applicants respectfully submit that neither of the applied documents, even in the proposed combination, assuming, *arguendo*, that such could be combined, discloses or suggests at least the above-discussed claimed features as recited, *inter alia*, in Claims 11, 16, 21, 26, and 27.

Applicants respectfully submit that <u>Girgensohn, et al.</u> discloses, e.g., using a motion detection algorithm (e.g., HMM with motion vectors) when segmenting video, wherein the classes of video detectable are still, pan, tilt, zoom, and garbage. But Applicants respectfully submit that this algorithm does not constitute a description or suggestion of at least the above-discussed claimed features. The Official Action also states that <u>Girgensohn, et al.</u>'s garbage class corresponds to the prohibited area, but Applicants respectfully traverse the foregoing. Applicants respectfully submit that <u>Girgensohn, et al.</u>'s garbage class corresponds to fast or non-linear camera movement (e.g., col. 2, lines 40-41), which bears no relation to the above-described claimed features.

Meanwhile, Applicants submit that <u>Colmenarez, et al.</u> discloses, e.g., using image matching techniques, but again is silent at least as regards the features mentioned above.

With respect to the 35 U.S.C. § 103 rejection, Applicants also respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features as recited, *inter alia*, in Claims 11, 16, 21, 26, and 27. Applicants respectfully submit that by means of such features as in Claims 11, 16, and 21, it is possible, for example, to generate plural moving picture

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files which are divided at a separating position being appropriate for an operation of a user who is watching the moving picture data, while by means of such features as in Claims 26 and 27, it is possible, for example, to divide moving picture data into a moving picture file having a prohibit area and a moving picture file not having the prohibit area in a case where a camera unit is controlled. Of course, the claims are not limited to the foregoing or to the disclosed embodiments.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached by telephone in our Washington, D.C.

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Respectfully submitted,

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